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**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

LAMONT TARKINGTON,	) Case No.: 2:18-CV-07636-CJC-JC
	)
Plaintiff,	) <b>PLAINTIFF’S EX PARTE</b>
	) <b>APPLICATION TO ENFORCE</b>
vs.	) <b>SETTLEMENT AGREEMENT</b>
	)
COUNTY OF LOS ANGELES; LOS	) Date: TBD
ANGELES COUNTY SHERIFF’S	) Time: 1:30 p.m.
DEPARTMENT; LOS ANGELES	) Ctrm.: 9B
COUNTY SHERIFF JIM MCDONNELL;	) Judge: Hon. Cormac J. Carney
LAUREN BROWN; JAMES MURREN;	)
DONALD YOUNG; LAWRENCE	)
BEACH ALLEN CHOI PC; and DOES 1-	)
10 INCLUSIVE;	)
	)
Defendants.	)
	)

PLEASE TAKE NOTICE that Plaintiff LaMont Tarkington ( “Plaintiff”) files this ex parte application to enforce the settlement agreement based on the following:

On December 3, 2019, the parties agreed to settle the above-captioned matter for a certain amount. Defendants informed Plaintiff that the County of Los Angeles Board of Supervisors will need 6-months to approve the settlement.

1 Due to Defendants' failure to approve and pay the settlement agreement, Plaintiff  
2 filed a Motion to Enforce the Settlement Agreement and set it for hearing on July 20,  
3 2020. (Dkt. 146.)

4 During the hearing on July 20, 2020, Defendants stated that the Los Angeles  
5 County Board of Supervisors had not approved the settlement but that it will be approved  
6 within 30-days.

7 On August 4, 2020, Defendants informed Plaintiff that the Los Angeles County  
8 Board of Supervisors approved the settlement.

9 On August 24, 2020, Plaintiff requested from Defendants the status of payment of  
10 the settlement. Defendants did not respond.

11 About 8-months has elapsed since the parties entered into a written settlement  
12 agreement, and about 3-weeks has elapsed since the Los Angeles Board of Supervisors  
13 approved the settlement. Yet, the status of payment of the settlement is unknown and  
14 Defendants will not respond nor provide a date certain for payment of the settlement.  
15 Defendants are taking advantage of the situation by not issuing payment of the  
16 settlement.

17 Plaintiff applies ex parte for the Court to issue an Order that Defendants issue  
18 payment of the settlement forthwith; that Defendants will incur interest on any unpaid  
19 portion of the settlement at 10% from the date of the Order; an award of attorney's fees  
20 and costs to enforce the settlement in amounts to be determined; and any other relief that  
21 the Court deems just and proper.

22  
23 Dated: August 28, 2020

By: /s/ Leo James Terrell  
Leo James Terrell, Esq.  
Attorneys for Plaintiff,  
LaMont Tarkington